

Exhibit F

From: Joshua K. Bromberg <JBromberg@kkwc.com>
Sent: Tuesday, January 28, 2020 6:22 PM
To: Miles, Christopher R. <MilesC@sullcrom.com>
Cc: Han, Suhana S. <HanS@sullcrom.com>; Dato, Tyler M. <datot@sullcrom.com>; Graham, Christopher A. <grahamch@sullcrom.com>; Marc Rosen <mrosen@kkwc.com>; David Parker <dparker@kkwc.com>
Subject: [EXTERNAL] RE: PSE/Elliott Section 1782 Teleconference

Chris,

Please see my responses in red below.

KLEINBERG
KAPLAN

JOSHUA K. BROMBERG
Kleinberg, Kaplan, Wolff & Cohen, P.C.
551 Fifth Avenue, New York, NY 10176
D: (212) 880-9895 | F: (212) 986-8866
jbromberg@kkwc.com
www.kkwc.com [kkwc.com]

From: Miles, Christopher R. [<mailto:MilesC@sullcrom.com>]
Sent: Monday, January 27, 2020 9:34 PM
To: Joshua K. Bromberg
Cc: Han, Suhana S.; Dato, Tyler M.; Graham, Christopher A.; Marc Rosen; David Parker
Subject: RE: PSE/Elliott Section 1782 Teleconference

Joshua,

I am writing to follow up on several points regarding Elliott's productions:

1. On December 10, 2019, PSE requested that Elliott conduct a search to locate responsive investment committee memoranda. During our December 30 meet and confer, you indicated that you would speak with your client, and you advised on January 9, 2020 that you would be providing information shortly. Please let us know when we can expect the production of the investment committee memoranda. **We have been advised by Elliott that there is no "investment committee" and accordingly no such memoranda exist. However, we understand that senior portfolio managers at Elliott periodically give presentations to management as part of a "portfolio review" process. We have located responsive documents created in connection with that process, and will produce those with appropriate redactions.**

2. During the December 30, 2019 meet and confer, you stated Elliott would provide examples of the position reports located during your preliminary review. I followed up on that request by email on January 8 and 14, 2020. It has now been nearly one month since the meet and confer, and we request that Elliott promptly produce the examples it has identified. As you know, we commenced our formal, substantive review only two weeks ago as a result of your agreement to the proposed revised search terms for Request 6. Having done so, we now are in a better position to identify the position reports that most commonly appear in the population. We expect to have those to you shortly, once the appropriate redactions have been made.

3. In addition to the search terms the parties have negotiated for Requests 6 and 7, we understand Elliott will be searching for documents responsive to Requests 1 through 5, including responsive transactional data. As we conveyed by email on August 13, 2019, because Requests 1 through 5 call for “documents sufficient to show,” PSE has not proposed search terms but expects certain relevant information would be found in Elliott’s central recordkeeping systems and/or with custodians other than those identified for Requests 6 and 7. Please confirm that Elliott is in the process of identifying documents responsive to Requests 1 through 5. Elliott has identified documents responsive to Requests 1 and 2, and still is in the process of identifying documents responsive to Request 3 through 5, to the extent that they exist.

4. Finally, we request that Elliott begin its rolling production next month. Also please propose some dates for a deposition. We expect to begin our rolling production next month and will follow up with you regarding deposition scheduling.

Regards,
Chris

From: Joshua K. Bromberg <JBromberg@kkwc.com>
Sent: Wednesday, January 15, 2020 5:13 PM
To: Miles, Christopher R. <MilesC@sullcrom.com>
Cc: Han, Suhana S. <HanS@sullcrom.com>; Dato, Tyler M. <datot@sullcrom.com>; Graham, Christopher A. <grahamch@sullcrom.com>; Marc Rosen <mrosen@kkwc.com>; David Parker <dparker@kkwc.com>
Subject: [EXTERNAL] RE: PSE/Elliott Section 1782 Teleconference

Chris,

Thank you.

We will commence our substantive review based on the Request 6 search terms proposed in our December 17 email, and your proposed search terms for Request 7. Of course, Elliott reserves the right to object to any request for supplemental searches following our review and production.

Regards,
JKB

**KLEINBERG
KAPLAN**

JOSHUA K. BROMBERG
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D: (212) 880-9895 | F: (212) 986-8866
jbromberg@kkwc.com
www.kkwc.com [kkwc.com]

From: Miles, Christopher R. [<mailto:MilesC@sullcrom.com>]
Sent: Tuesday, January 14, 2020 2:36 PM
To: Joshua K. Bromberg
Cc: Han, Suhana S.; Dato, Tyler M.; Graham, Christopher A.; Marc Rosen; David Parker
Subject: RE: PSE/Elliott Section 1782 Teleconference

Joshua,

We disagree that it would “of course” be unduly burdensome for Elliott to review the additional 22,000 documents identified by the expanded search and with your claim that the “vast majority” of the 22,000 documents necessarily will be not responsive to the subpoenas. However, in the interest of moving this process forward, we are willing to agree to your December 17 proposal as a first step for identifying documents responsive to Request 6. PSE reserves the right to seek supplemental searches in the circumstance that, after PSE’s review of documents produced by Elliott, PSE believes that the December 17 search proposal did not adequately capture documents responsive to Request 6.

We will review the representative examples of the position reports when you send them to us. Elliott’s review process should begin now and productions should not be delayed until after resolution of that issue.

Please also confirm that you are commencing your review of the documents captured by the search terms we provided for Request 7.

Regards,
Chris

From: Joshua K. Bromberg <JBromberg@kkwc.com>
Sent: Monday, January 13, 2020 7:53 PM
To: Miles, Christopher R. <MilesC@sullcrom.com>
Cc: Han, Suhana S. <HanS@sullcrom.com>; Dato, Tyler M. <datot@sullcrom.com>; Graham, Christopher A. <grahamch@sullcrom.com>; Marc Rosen <mrosen@kkwc.com>; David Parker <dparker@kkwc.com>
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Chris,

With respect your inquiry regarding a search term connector of AND rather than /10, we’ve been advised that it results in 23,989 hits and 37,181 hits when families are included.

Of course, it would be unduly burdensome for Elliott to review an additional 22,000 documents given that the vast majority will not be responsive to the document subpoena. Accordingly, please confirm your agreement to the /10 proximity connector and additional proposed terms set forth in my December 17 email, so that we can commence our formal review.

We expect to be able to provide the representative examples of position reports soon (which documents will represent the commencement of our rolling production), and are following up with our client regarding investment committee memoranda, per your request.

Kind regards,
JKB

From: Joshua K. Bromberg
Sent: Thursday, January 9, 2020 8:59 AM

To: Miles, Christopher R. <MilesC@sullcrom.com>
Cc: Han, Suhana S. <HanS@sullcrom.com>; Dato, Tyler M. <datot@sullcrom.com>; Graham, Christopher A. <grahamch@sullcrom.com>; Marc Rosen <mrosen@kkwc.com>; David Parker <dparker@kkwc.com>
Subject: RE: PSE/Elliott Section 1782 Teleconference

Chris,

As you know, I was on vacation when we spoke and returned to the office this week. We are following up on your queries and expect to provide the information shortly.

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JOSHUA K. BROMBERG
Kleinberg, Kaplan, Wolff & Cohen, P.C.
551 Fifth Avenue, New York, NY 10176
D: (212) 880-9895 | F: (212) 986-8866
jbromberg@kkwc.com
www.kkwc.com [kkwc.com]

From: Miles, Christopher R. [<mailto:MilesC@sullcrom.com>]
Sent: Wednesday, January 08, 2020 6:35 AM
To: Joshua K. Bromberg
Cc: Han, Suhana S.; Dato, Tyler M.; Graham, Christopher A.; Marc Rosen; David Parker
Subject: RE: PSE/Elliott Section 1782 Teleconference

Counsel,

I am following up on last week's call. You stated that you would provide to us search term hit counts for a revised version of your December 17, 2019 search term proposal with an "AND" limiter rather than "/10". You also agreed to send us representative examples of reports of Elliott's positions captured by your current search that you believe would be unduly burdensome to produce because the reports include information that you believe is non-responsive and that you intend to redact if produced. You also informed us that you would discuss with your client the location of any relevant investment committee memoranda.

Please let us know when you anticipate sending the search term hit counts and the representative reports and whether you have had an opportunity to discuss the location of investment committee memoranda with your client.

Regards,
Chris
